



**FILED**

09/10/18  
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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding )  
Revisions to the California Universal Telephone ) R.11-03-013  
Service (LifeLine) Program. )  
\_\_\_\_\_ )

**JOINT COMMENTS OF  
SPRINT CORPORATION AND IFOSTER  
IN RESPONSE TO  
“RULING REQUESTING COMMENTS ON AUGUST 6-7, 2018 WORKSHOP AND ON  
POTENTIAL CALIFORNIA LIFELINE PILOT PROGRAMS”**

**Introduction**

Pursuant to the August 31, 2018 Administrative Law Judge’s Ruling Requesting Comments on the August 6-7, 2018 Workshop (“August Workshops”) and on Potential California Lifeline Pilot Programs (hereinafter, “the Ruling”) in the above-captioned proceeding, Sprint Corporation (“Sprint”), through its wholly owned subsidiary, Sprint Spectrum L.P. (U 3062 C), and Sprint Spectrum’s “dba” or “brand” name of “Boost Mobile,”<sup>1</sup> and iFoster<sup>2</sup> respectfully submit these Joint Comments on the Ruling. (Boost Mobile and iFoster are jointly referred to herein as “Pilot Partners.”) These Comments are timely filed.<sup>3</sup>

In light of the *Fourth Report and Order*, *Order on Reconsideration*, *Memorandum Opinion and Order*, *Notice of Proposed Rulemaking*, and *Notice of Inquiry* (“NPRM/NOI”)<sup>4</sup>,

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<sup>1</sup> Sprint Corporation is a party on the service list in this proceeding and has previously participated in this proceeding as a party, having filed Comments on June 12, 2013, under its former name, Sprint Nextel. Sprint submits these Comments on behalf of its wholly owned subsidiary, Sprint Spectrum L.P. (U 3062 C) and Sprint Spectrum’s “dba” or “brand” name of “Boost Mobile.”

<sup>2</sup> iFoster is also a party in this proceeding.

<sup>3</sup> The Ruling set September 10, 2018, as the due date for submission of comments on the Ruling.

<sup>4</sup> See the Ruling at pg. 2, *see also* In the Matter of Lifeline and Link Up Reform and Modernization et al., WC Dkt Nos. 11-42, 09-197, 17-287 Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry (NPRM/NOI), FCC 17-155 (rel. December 1, 2017).

issued on December 1, 2017 by the Federal Communications Commission (“FCC”), and also in light of the significant number of California LifeLine-eligible households that are not currently participating in the California LifeLine program, the Pilot Partners support the California Public Utilities Commission’s (“CPUC” or “Commission”) investigative and analytical efforts for increasing participation in the LifeLine Program. The Pilot Partners, like the Commission, are concerned that potential federal Lifeline program changes may substantially alter the nature of that program and, in turn, impose major impacts on the California LifeLine program and its participants. The Pilot Partners support the Commission’s desire to identify and evaluate existing California LifeLine program rules, processes and policies that should be modified to improve LifeLine program participation and the LifeLine customer experience.

### **Discussion**

#### **I. THE COMMISSION SHOULD APPROVE THE 24 MONTH MULTI-PHASED BOOST PILOT PROGRAM.**

Over the last six months, Boost Mobile has worked extensively to develop a detailed 24-month multi-phase pilot program (the “Boost Pilot”) that seeks to address the various Commission concerns and objectives set forth above. Boost has regularly sought feedback from Commission staff and is working closely with Commission-identified partners, which include state agencies and certain consumer-based organizations (such as iFoster), that control and/or interact with the member/customer databases of individuals who are eligible to receive California LifeLine subsidy support based on their income level. This three-pronged development process is the foundation for the Boost Pilot, as presented by Boost Mobile during the August Workshops, and as further detailed in the Boost Pilot plan description attached hereto as Attachment A.

The Pilot Partners respectfully request that the Commission suspend all such provisions of General Order (“G.O.”) 153 as the Commission deems necessary (*e.g.*, provisions governing enrollment processes) for carrying out the purposes of the LifeLine program and the Boost Pilot for persons who the CPUC can reliably ascertain are eligible for California LifeLine service and are therefore eligible to participate in the Boost Pilot. The suspension of such provisions of G.O. 153 for the Boost Pilot is necessary in order for the Commission to: (a) obtain data and evaluate the effectiveness of potential process and rule changes that will increase California LifeLine participation, (b) ease some of the existing hurdles in the current California LifeLine application, verification and recertification processes, and (c) test out other possible rule changes that may be appropriate in response to potential final actions undertaken by the FCC in the *NPRM/NOI*.

The process and operational details of the Boost Pilot are set forth in Attachment A. Although the Boost Pilot is substantially developed, the process as depicted in Attachment A relies on Commission funding, among other related assumptions, and is therefore subject to further change, refinement and revision. Boost Mobile and iFoster will continue to collaborate with Commission staff and other Pilot Partners (as currently identified and those yet to be identified by Commission staff) regarding all facets of the Boost Pilot, not only through the launch of each phase, but through the conclusion of the entire Boost Pilot.

### **Conclusion**

For the reasons discussed herein, the Pilot Partners respectfully request that the Commission approve the Boost Pilot as set forth in Attachment A.

Respectfully submitted:

Boost Mobile, a brand of Sprint Spectrum  
L.P., a wholly owned subsidiary of Sprint  
Corporation

/s/

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/s/

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Dated: September 10, 2018

Attachment A

Boost Mobile/CPUC Pilot Program



# Boost Mobile/CPUC Pilot Program

9/14/18

Disclaimer: Contents of this presentation are subject to further revision/modification



# Content

- Pilot Overview
- iFoster Cohort Program Details
- Additional Partners Program Details
- Appendix





# Pilot Overview

- In direct response to CPUC concerns regarding the FCC's NPRM/NOI, low subscriber response and renewal rates and an overall desire to improve in the existing CA LifeLine program, Boost presents the proposed pilot, offering a subsidized wireless offer to qualifying CA residents. Through partnerships with the CPUC, NPOs, CBOs and CA government agencies, eligible members participating in this pilot may receive a \$15.00 discount to Boost service plans. This multi-phased pilot will include subscriber volume that is high enough to provide a statistically significant sampling and will yield meaningful information, including improved take rate and other goals and objectives as defined by the CPUC. Monthly subsidy reimbursement for active subscribers to be funded by the CPUC (specific partner subsidy amounts vary, as set forth below).

## ELIGIBILITY

How is a potential customer pre-determined to be eligible for the discounted LL program on Boost

## AWARENESS

How does a customer learn about this program

## ACTIVATION

How does the customer get onto the discounted Boost monthly rate plan

## SUBSIDY REIMBURSEMENT

How does Boost reconcile with the CPUC

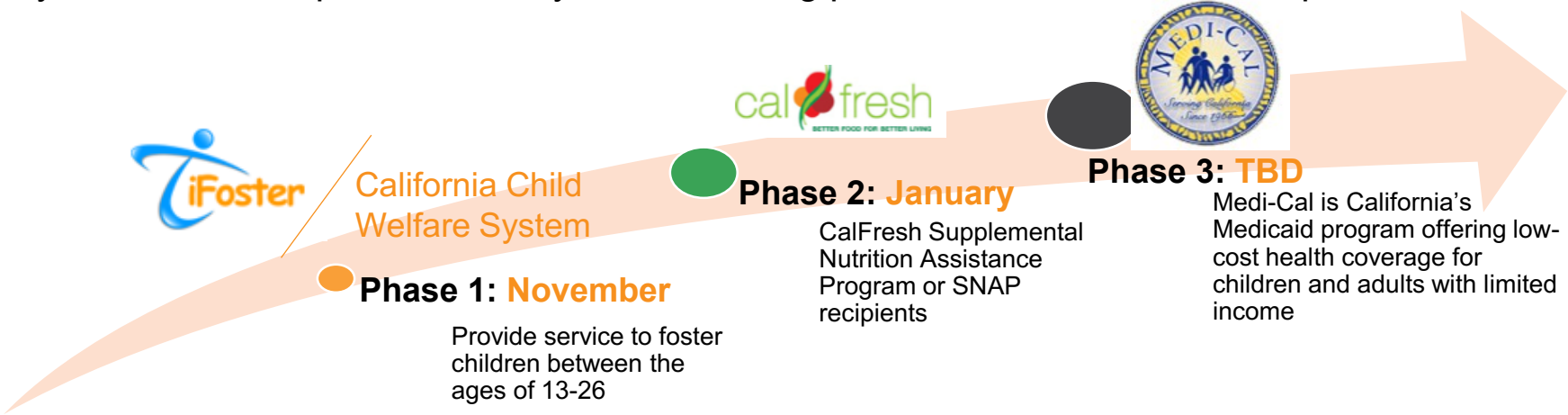
### Proposals for Pilot:

- ✓ **ETC status** – not applicable to pilot program.
- ✓ **1 LL per Household** – not applicable to pilot program
- ✓ **Eligibility Determination** – CPUC/Partners determines eligible participants for pilot
- ✓ **Inactivity Rules** – not applicable to pilot program. Payment of non-subsidized monthly charge counts as activity.
- ✓ **Annual Recertification** – eligible for duration of pilot program. Monthly eligibility file confirmation serves as annual recert.
- ✓ **Expedited approval of the Pilot Program**

# Pilot Program Multi-Phased Rollout Approach

## Crawl – Walk – Run

- Once program approval is reached, Boost can set up operational model within 6-8 weeks. Dates below are tentative.
- Boost can support a model where we run multiple partners at the same time, but we can introduce a new one every 4-6 weeks
- Note: CPUC may add additional partners to any of the existing phases or create additional phases



	Sept '18	Oct	Nov	Dec	Jan '19	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept
Proposed Rollout Pilot Programs	CA Children and Family Services->												
	CalFresh->												
	Medi-Cal->												
	Other partners as determined by CPUC->												

# Pilot Program Duration Considerations

## Measure Success – Alter – End or Extend

Boost recommends a pilot duration of 18-24 months for each partner because this will give CPUC & Boost:

- “Soak time” for new partners to get up to speed on process, the offer, and best way to educate potential members
- Means to identify any operational hurdles and implement solutions
- Measure success in an environment where there are no other competing factors influencing the program design

## Customer is eligible for the subsidy (as long as they pay their portion of the monthly payment) due up through the targeted end date of the pilot program for each partner (up to 24 months)

- If pilot ends, Boost will imitate a customer education process for subscriber to maintain service at a non-discounted rate. Subscribers who do not choose a new Boost plan by the pilot’s end date will be automatically migrated to the lowest market offer (*\$35 Unlimited Talk & Text, 3GB High Speed data*)
- If pilot extends, customer will continue to receive subsidy discount

Proposed Duration Pilot Programs	Sept '18	...	Jan '19	...	Apr '19	...	Jun '19	...	Sept '19	...	Jan '20	...	Apr '20	...	Jun '20	...	Sept '20	...	Jan '21	...	Apr '21	...	Jun '21	...	Sept '21
	Partner A-----End or Extend																								
	Partner B-----End or Extend																								
	Partner C-----End or Extend																								
	Other -----End or Extend																								

# Pilot Details | iFoster

# iFoster

- Offer
- Process Flow
- Communication Strategy
- Reporting
- Training/Resources
- Subscriber Handling



# California LifeLine Subsidy Pilot

## Unique Offer for iFoster

- **CPUC has indicated its intent to cover device provision for iFoster youth**



SRP: \$80

Product Specs: <https://www.boostmobile.com/phones/zte-prestige-2.html>

- **Boost creates a unique, discounted offer configured at \$0 monthly payment for iFoster youth**
- **Monthly Service is subsidized by CPUC**

### Boost Offer Notes:

- All plans are for single lines only
- Existing Boost subscribers are eligible for discounted offer if pre-determined by CPUC/iFoster/County Government
- \*Requires CPUC approval



Boost Monthly Plan		\$35
Offer Discount for iFoster		(\$10.00)
Amount Subsidized by CPUC		(\$25.00)
<b>Foster Youth Pays Monthly</b>		<b>\$0</b>
Plan Includes		
Talk	Unlimited Talk	
Text	Unlimited Text	
Data	Unlimited Data w/3GB High-Speed Data	
Mobile HotSpot	Extracted from High Speed Data; Additional Data Available For purchase	
Video Speeds	SD Video	

- *These Boost price plans are configured exempt from MTS for this program. All telecommunication taxes and surcharges applicable to such services are exempt on this price plan and no taxes or surcharges apply to the subsidy received from the CPUC and its affiliates. (Unless otherwise indicated by the CPUC)*
- *Only 1 package (phone + service) can be provided per youth based on Youth Name, Youth DOB, Youth Ward of the Court letter.*

# Process Flow

## ELIGIBILITY

## AWARENESS

## ACTIVATE

## SUBSIDY

CPUC

County  
Gov't

iFoster

Boost Mobile

iFoster creates a unique application to determine youth eligibility. Working in conjunction with county governments, documentation

### ELIGIBILITY DOCUMENTATION

- Youth/CSW agreement
- Proof of Dependency (WOC or LOD) with having been in foster care on their 13th birthday)
- Approval to share privacy data (first/last name, DOB, shipping address)

Boost sends file of unique promotion codes to iFoster

### PROMOTION CODE

- Promo codes are one time use
- Have an expiration date
- Only good for new customers to Boost
- \*Manual process established to move a qualifying existing Boost customer onto pilot

On behalf of the foster you, iFoster purchases/orders the Boost Device and Uses one time use promotion code to unlock discounted offer and activate the account at boostmobile.com

### BOOST PROVIDES

- Digital landing page/url with program rules and training materials for iFoster representatives and foster Youth
- Unique Program FAQs
- Escalation intake form for iFoster to communicate with Boost to handle escalations/special cases

### OPEN:

- Waiting for methodology from the Commission on what this would look like. If required, Boost can provide a 2<sup>nd</sup> promo code for the purchase of an approved handset.

Boost generates a list of all active subscribers on unique iFoster

iFoster performs data true-up monthly

CPUC issues subsidy reimbursement to Boost for active subscribers on Promo SOC's.

### ELIGIBILITY VALIDATION

- First, Last, DOB, PTN (promo code and unique identifier)

Boost Internal Accounting

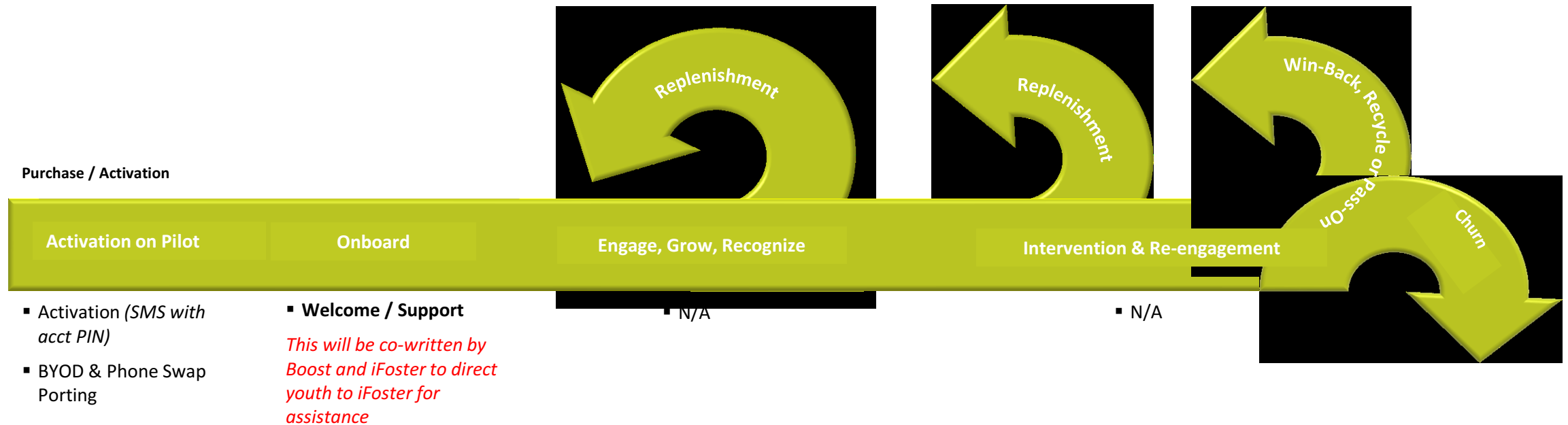
Boost Revenue Reconciliation

Customer Exception Request

Remove subsidy from ineligible subscribers

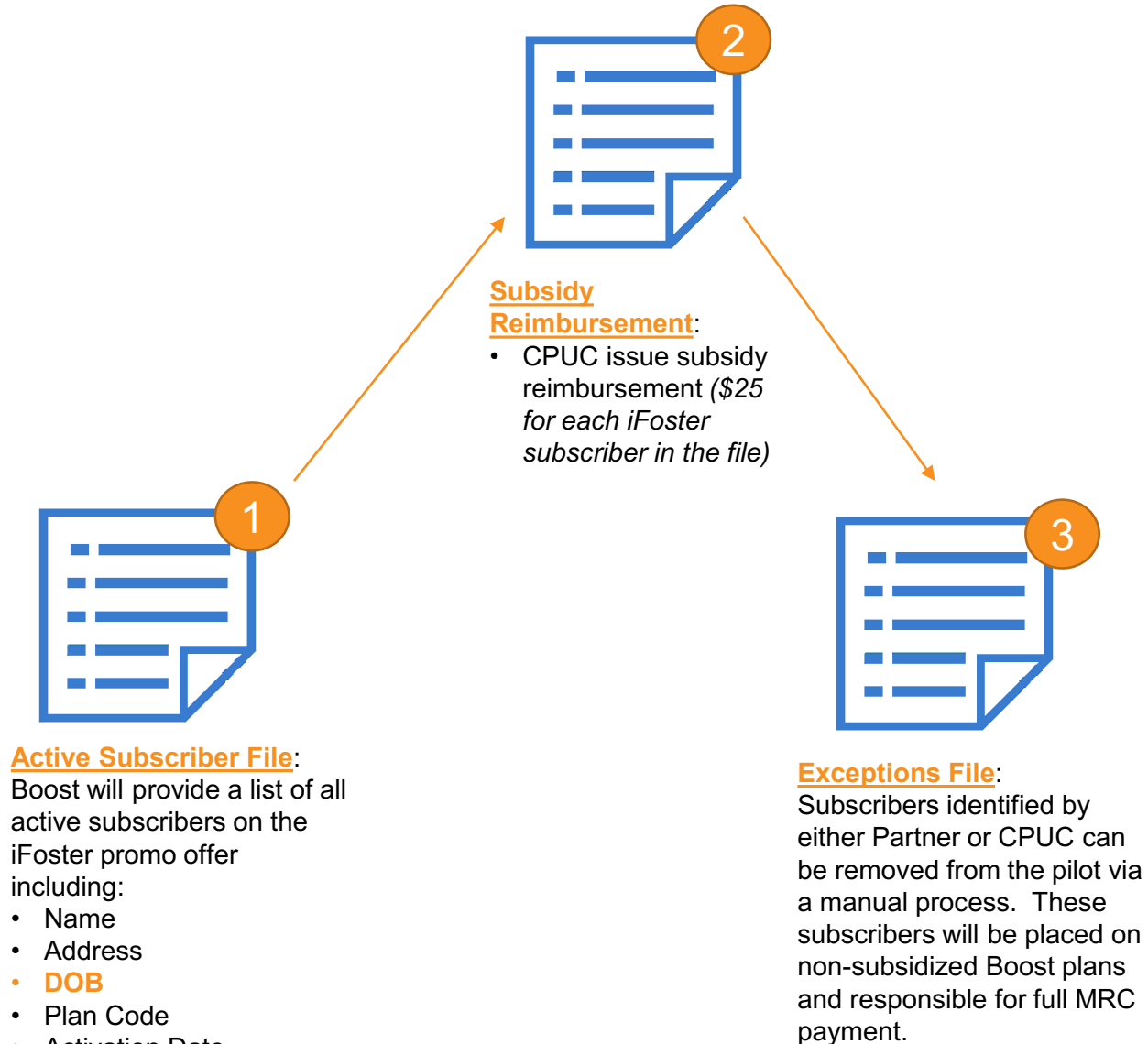
# Customer Communication Strategy

- Boost Mobile anticipates communication with pilot participants and will collaborate with CPUC and iFoster as to the content, frequency, and outreach methods of those communications
- All collateral and communication materials will be shared with the CPUC for review/approval





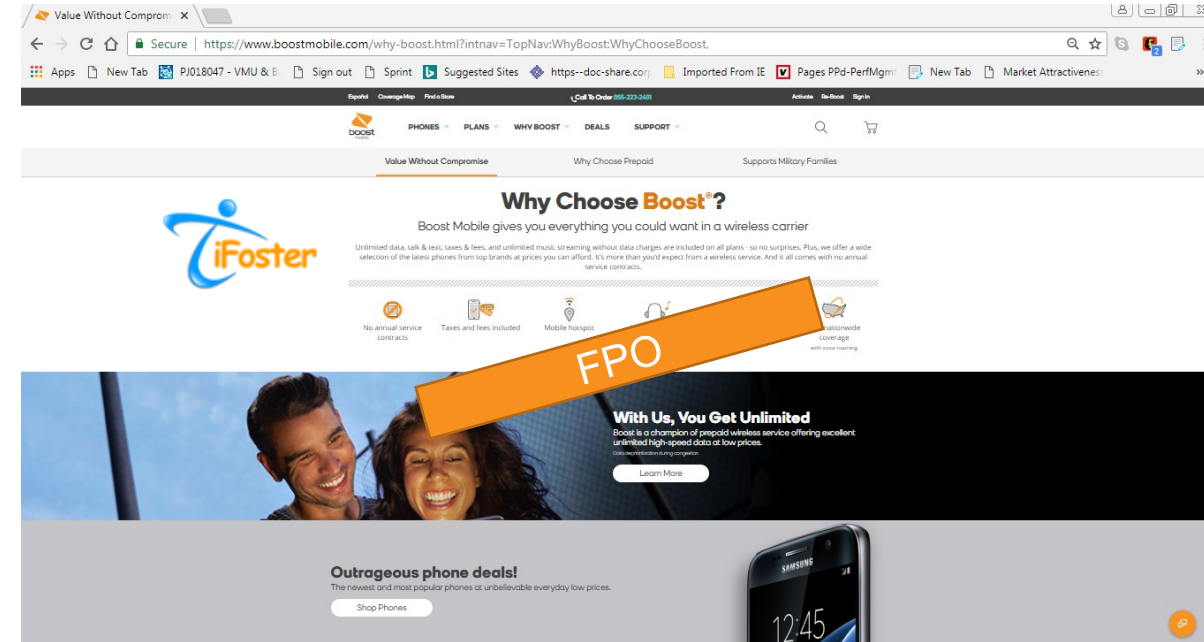
# Reporting / Subsidy Reimbursement Filing



Reporting		
Type	Metric	Frequency
Data	<ul style="list-style-type: none"><li>• Activation Rate</li><li>• Churn Rate</li><li>• Activation Date</li><li>• Tenure in Pilot Program</li></ul>	Monthly
Usage Behavior	<ul style="list-style-type: none"><li>• Usage: Data, Voice, Text</li><li>• Add-On Purchases/Spending Trends</li></ul>	Quarterly
iFoster Survey	<ul style="list-style-type: none"><li>• Academic/employment performance</li><li>• Social connectiveness</li><li>• Overall well-being</li></ul>	Quarterly

# Training and Resources

- Boost Mobile, in collaboration with iFoster and the CPUC will support the pilot with training documentation and both printed and digital resources
- A unique landing page url will be established to support iFoster associates and youth escalate cases as needed
- \*CPUC will review and approve in an expedited manner



# Subscriber Handling

In order to operationally support the pilot, Boost will create new internal processes to handle subscriber escalations.

- Existing Boost subscriber is eligible to partake in the Pilot –
  - **Eligibility:** iFoster, in conjunction with county governments, must determine subscriber is eligible to participate in the pilot and have available a valid promo code for the youth
  - **Channel:** Boost will create a registration-like intake form on the web for iFoster or the youth to securely enter their account information along with a valid, unused promo code
  - **Plan Update:** Internal teams will manually move the subscriber onto the pilot program via a backend script. This script will be performed on a weekly basis
- Loss of Eligibility – To prevent fraud, waste and abuse, the CPUC or iFoster may determine a subscriber is no longer eligible to participate in the pilot. In this case, Boost will remove the subscriber from the pilot and place them on the lowest cost offer in market.
  - **Identification:** iFoster or the CPUC will identify the subscriber and flag the account for removal
  - **Subscriber Removal Request:** Customer account detail (Name, PTN, etc.) should be provided on a formatted file provided by Boost and uploaded to a Sprint secured FTP site by the CPUC or a named affiliate with authorization to remove subscribers immediately from the pilot program.
  - **Timing:** Files will be processed in a timely manner so that the subscriber will be removed from pilot before the next monthly subsidy filing
- Subscriber Plan Changes – In order to properly track subscriber engagement during this trial, plan changes after activation into the pilot program will not be supported

# Pilot Details | Additional Partners

# Partners

- Offer
- Process Flow
- Communication Strategy
- Reporting
- Training/Resources
- Subscriber Handling
- Pilot Termination Strategy



# Proposed Boost Offer

## California Lifeline Offer

- **No Device Discount**  
However, can be combined with device promotions on BoostMobile.com or Boost Mobile stores
- **Eligible customers receive \$15.00\* Off Any Rate Card Plan**

### Boost Offer Notes:

- All plans are for single lines only.
- Existing Boost subscribers are eligible for discounted offer if pre-determined by CPUC/Partner/County Government
- \*Requires CPUC approval



- Eligible California LifeLine participants will be directed to the lowest cost option for Boost
- Great phone offers – Even **FREE** available if customer switches their current number to Boost

Boost Monthly Plan	\$35	\$50	\$60
CA LL Member Pays	\$20.00	\$35.00	\$45.00
Plan Includes			
Talk	Unlimited Talk		
Text	Unlimited Text		
Data	Unlimited Data w/3GB High-Speed Data	Unlimited High Speed Data	Unlimited High Speed Data
Mobile HotSpot	For purchase	8GB in plan	20GB in plan
Video Speeds	SD Video	SD Video	HD Video

**All Plans**  
Include 50 domestic voice roaming minutes (sel. devices). Int'l. svcs. extra. Unlimited services are on-network only. Unlimited 4G LTE data where available. \$35 plan, after 3GB, speeds reduced to 2G. **Family Plan:** Up to 5 lines total. Primary responsible for monthly pymt. for all lines & its add-ons. Secondary lines pay their one-time/add-on purchases. **Mobile Hotspot, VPN & P2P Limits:** 8GB on the \$50 plan; 20GB on \$60 plan; 40GB on \$80 plan. \$35 plan, usage draws from high-speed data then reduced to 2G speeds. **Other Terms:** Total plan price includes services, taxes and fees. Pymt. due on monthly pymt. date or acct. will be suspended. Sufficient funds must be added within 120 days of suspension or acct. will expire & acct. balance will be forfeited. No annual svc. contracts. Offers/coverage not avail. everywhere or for all phones/networks. Sprint 4G LTE network reaches over 300 million people. Boost reserves the right to change or cancel offer at any time. Prohibited network use rules & other restrictions apply. See [boostmobile.com](http://boostmobile.com) or store for details.

# Process Flow

## ELIGIBILITY

## AWARENESS

## ACTIVATE

## SUBSIDY

CPUC Partner

Boost Mobile

Customer

Boost sends file of unique promotion codes to CPUC for each partner

Creates process to distribute one-time use promotion codes to eligible members with instructions

### BOOST PROVIDES

- Training/Simple talking points for offer for 3<sup>rd</sup> Party to use
- Flyer/eFlyer (takeaway collateral) to give to potential partner to consider program with key requirements to engage with program
- Unique web landing page with full set of instructions & FAQs

### PROMOTION CODE

- Promo codes are one time use
- Have an expiration date
- Only good for new customers to Boost

Customer Purchases Boost Device and Uses one time use promotion code to unlock discounted offer

Boost pulls list of active subscribers on unique CPUC offer codes (monthly)

CPUC issues subsidy reimbursement to Boost for active subscribers on Promo SOC's

Boost Internal Accounting

Boost Revenue Reconciliation

Customer Exception Request

Remove subsidy from ineligible subscribers

# Customer Journey

## ELIGIBILITY



Boost Mobile provides a unique one-time use promotion code to Partner for distribution to qualified members

## AWARENESS



Partner provides unique one-time use promotion code to qualified members with instructions for how to get a phone & enroll

## ACTIVATION



Customer uses promotion code to purchase device and activate on a unique plan which contains the \$15.00 discount

## SUBSIDY REIMBURSEMENT



Boost reconciles with CPUC for every promotion code that is redeemed and active service plan.

### CPUC/Partner

- Create program policies unique to their subscriber cohort, if applicable
- Provide a list of eligible participants and/or provide quantities for requested promo codes to Boost (CPUC may invoke a maximum subscriber count by partner for pilot participation)
- Distribute unique promo codes to individual members
- Aide members through activation process (accept device delivery if needed)
- Work with CPUC or County Government on subsidy reimbursement and member reconciliation if required

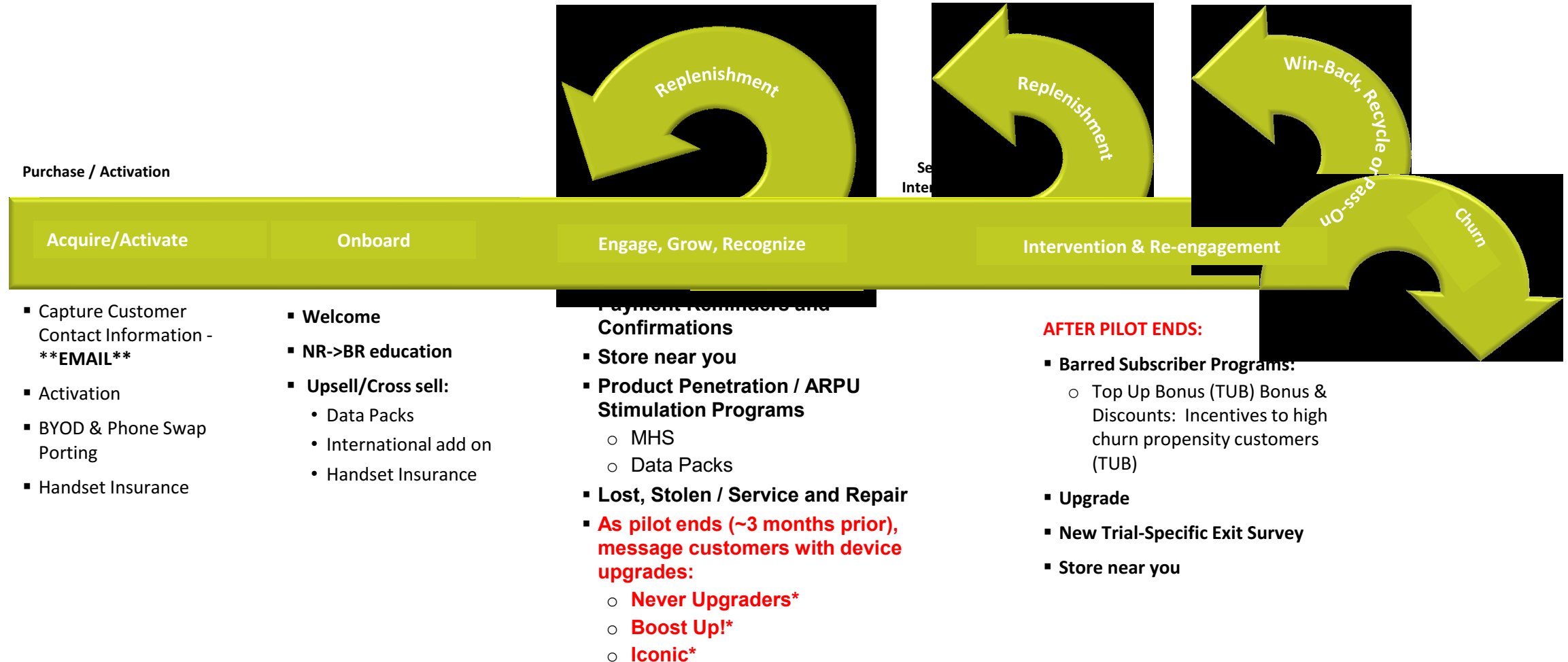
### Boost Mobile

- Issue and manage promo codes for eligible members
- Create an easy activation experience for members via promo codes to access subsidized plans
- Provide a specified number of promotion codes as indicated by the CPUC, state agency or the partner
- Handle escalation requests to remove participants from trial as requested by Partner/CPUC
- Provide a list of active subscribers for subsidy filing on a monthly basis
- Provide technical and operational program support as needed

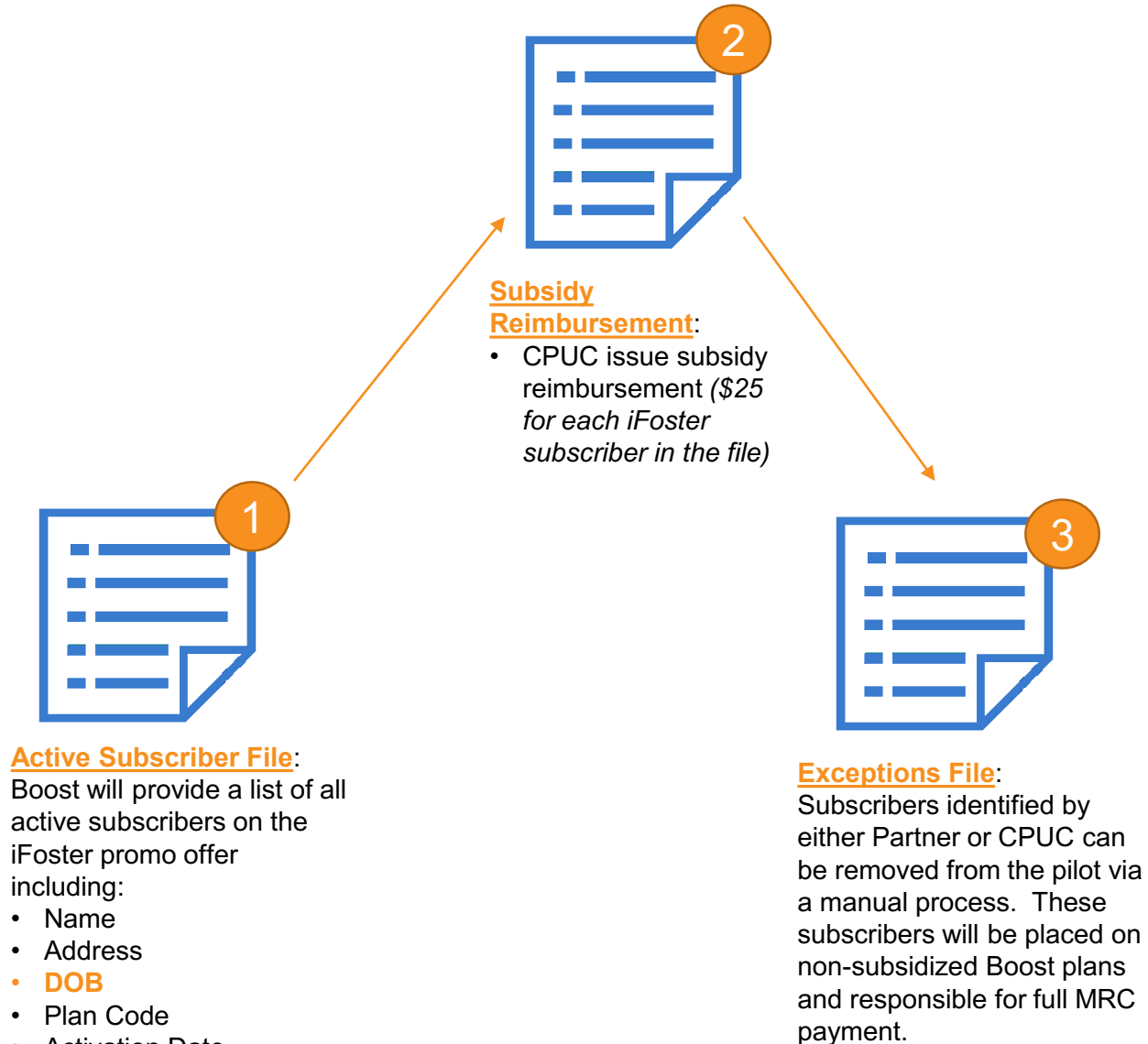


# Customer Communication Strategy

- All collateral and communication materials will be shared with the CPUC for review/approval
- Boost Mobile may provide incentivized options for upgrades near pilot's end



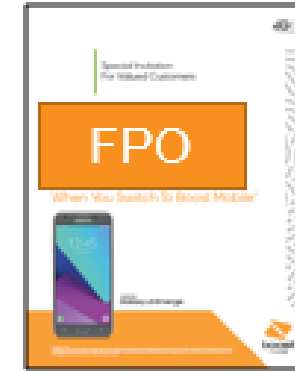
# Reporting / Subsidy Reimbursement Filing



Reporting		
Type	Metric	Frequency
Data	<ul style="list-style-type: none"><li>• Activation Rate*</li><li>• Churn Rate*</li><li>• Activation Date*</li><li>• Tenure in Pilot Program*</li><li>• Promo code redemption*</li></ul>	Monthly
Usage Behavior	<ul style="list-style-type: none"><li>• Usage: Data, Voice, Text</li><li>• Add-On Purchases/Spending Trends</li></ul>	Quarterly
Boost Mobile Survey	<ul style="list-style-type: none"><li>• TBD – surveys can vary by Partner and can be conducted at different intervals throughout the pilot</li></ul>	Annually
*Aggregated by Partner		

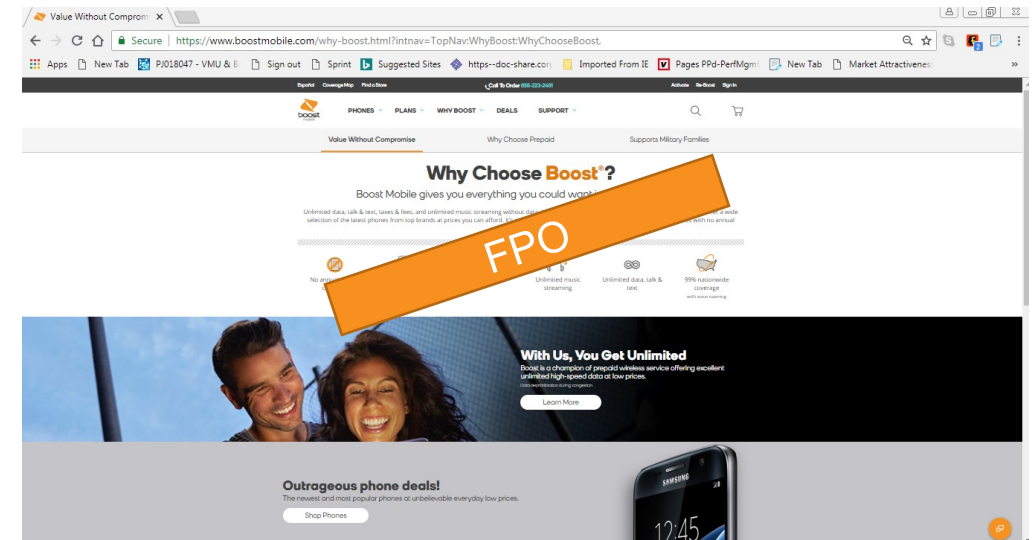
# Training and Resources

- Boost Mobile, in collaboration with the Partner and the CPUC, will support the pilot with training documentation and both printed and digital resources.
- Tactics may include, but not limited to:
  - *Unique Landing page/url for each Partner*
  - *Printed educational materials*
  - *Collateral to assist in the distribution of the Promo Code*
  - *Co-branded Marketing materials*
  - *Sales Training for all representatives in Boost brick and mortar locations*
  - *Text message communications*
- \*CPUC will review and approve in an expedited manner



Printed collateral

Digital Support of Program



# Subscriber Handling

In order to operationally support the pilot, Boost will create new internal processes to handle subscriber escalations.

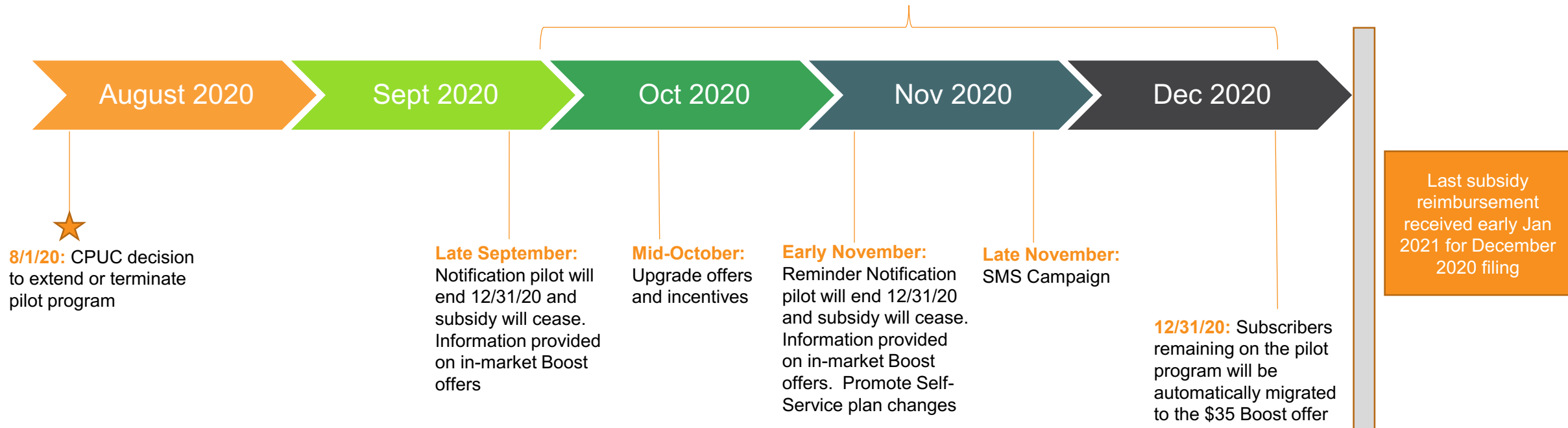
- Existing Boost subscriber is eligible to partake in the Pilot –
  - **Eligibility:** Partner must determine subscriber is eligible to participate in the pilot and issue a promo code
  - **Channel:** Boost will create a registration-like intake form on the web for the subscriber to securely enter their account information along with a valid, unused promo code
  - **Plan Update:** Internal teams will manually move the subscriber onto the pilot program via a backend script. This script will be performed on a weekly basis
- Loss of Eligibility – To prevent fraud, waste and abuse, the CPUC or a Partner organization may determine a subscriber is no longer eligible to participate in the pilot. In this case, Boost will remove the subscriber from the pilot and place them on the lowest cost offer in market.
  - **Identification:** CPUC or Partner will identify the subscriber and flag the account for removal
  - **Subscriber Removal Request:** Customer account detail (Name, PTN, etc.) should be provided on a formatted file provided by Boost and uploaded to a Sprint secured FTP site by the CPUC or a named affiliate with authorization to remove subscribers immediately from the pilot program
  - **Timing:** Files will be processed in a timely manner so that the subscriber will be removed from pilot before the next monthly subsidy filing
- Subscriber Plan Changes – In order to properly track subscriber engagement during this trial, plan changes after activation into the pilot program will not be supported

# Pilot Termination Strategy

**DRAFT PLAN,  
APPROVAL REQUIRED**

Boost Mobile in conjunction with the CPUC will set clear direction and full transparency to inform and engage all participants prior to the potential end of the pilot program. The roadmap below illustrates the communication and education plan to forewarn customers that the subsidy offer will end and incentivize subscribers to remain Boost customers.

**3 Month Lead Time to Educate  
Subscribers and Execute Plan**



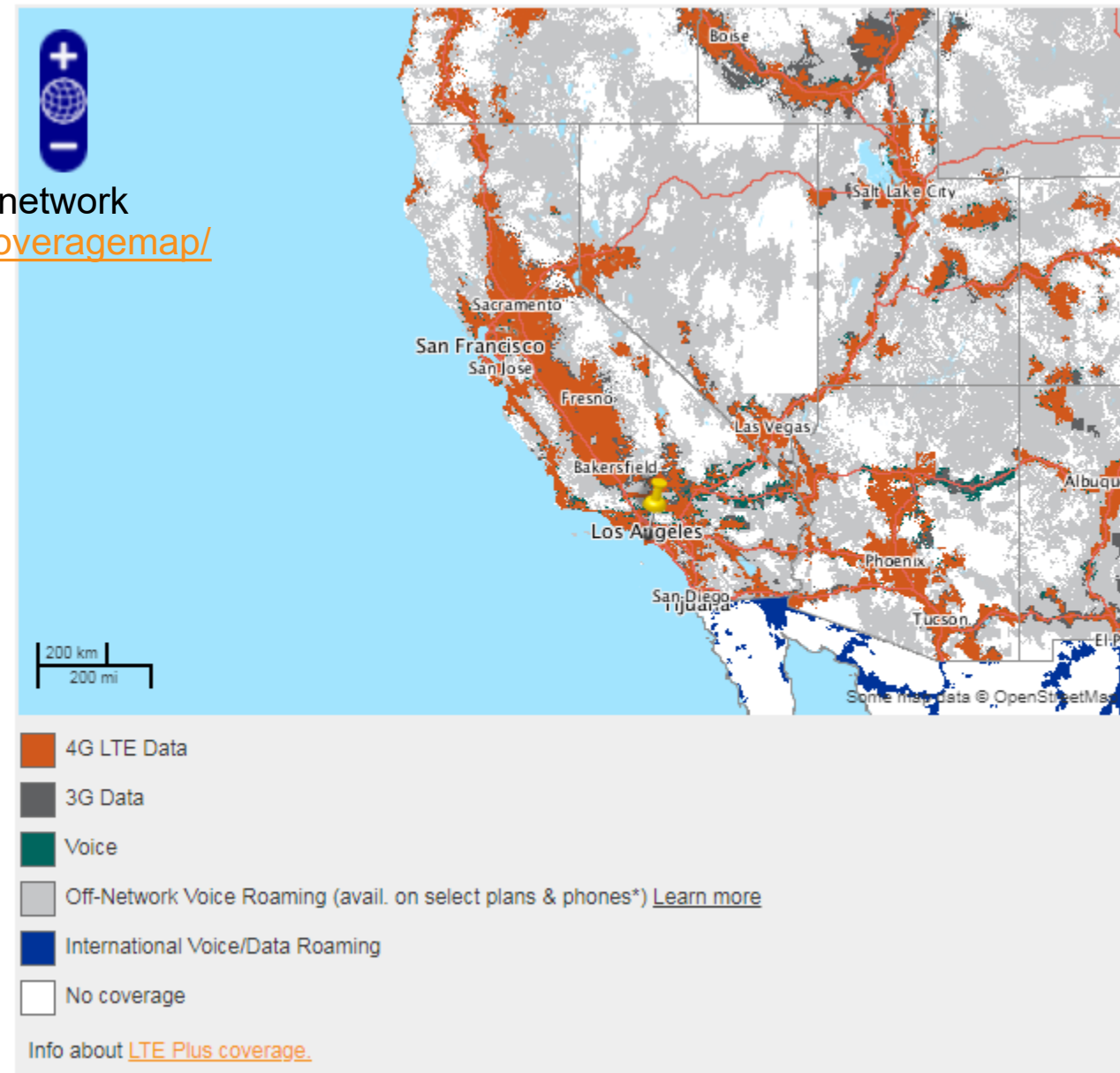
# Appendix

# Coverage Map

- Boost service coverage area, subject to change per Sprint's network  
<https://www5.boostmobile.com/?id16=coverage%20map#!/coveragemap/>
- Zip code file updated monthly



Microsoft Excel  
ma Separated Valu



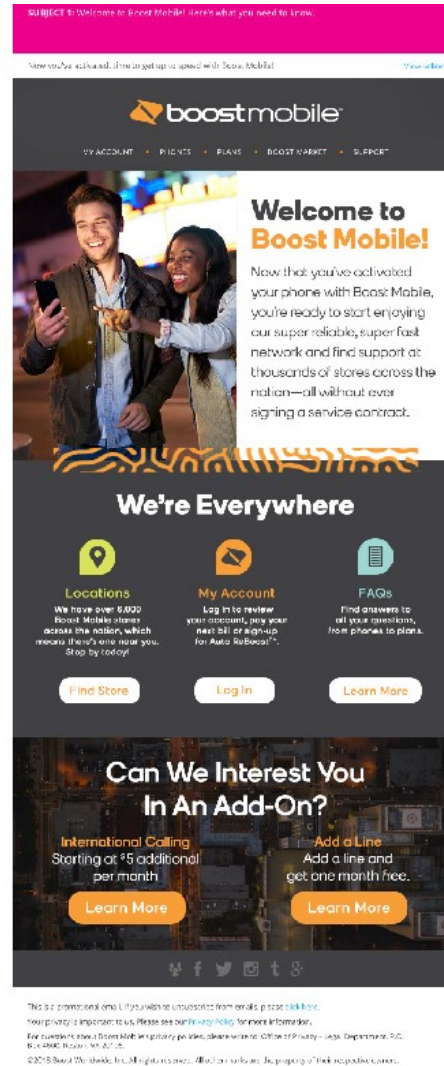
# Additional Services

- Additional services may be subject to taxes and surcharges applicable to normal retail Boost transactions, outside of any subsidy plan.

Category	Offers	Cost to customer (per month unless stated otherwise)
International	Todo Mexico Plus	\$5
	Int'l Connect Plus	\$10
	International Minute Packs	Varies
	International Talk & Text Pay By The Minute	Varies
Everyday Services	Phone Insurance	\$7
	Secure Wi-Fi	\$2
	Data Packs	Varies
	HD Buy Up	\$10
	Mobile Hotspot 1.5gb or 10gb	\$25/\$50
	Premium Visual Voicemail	\$3
	Premium Caller ID	\$2
	Safe & Found	\$7
	411	\$2 per use
Social & Entertainment	AirG	\$5
	boostTV™	\$10
	PlayPhone Gaming	\$5
	TIDAL Premium/ TIDAL HiFi	\$10/\$20



# Sample Welcome Email



# iFoster Materials

- Proof of Dependency Letter



- Ward of the Court Letter



- LifeLine Pilot Agreement County Agency Form 2018



- iFoster Information Release



- Data Shared with Boost Mobile & CPUC

